

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

KATHERINE SWEENEY,

Plaintiff,

v.

**ASSOCIATION OF INDEPENDENT
MORTGAGE EXPERTS,**

Defendant.

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Case No. 25-00392

DEFENDANT’S NOTICE OF REMOVAL

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Defendant, NATIONAL ASSOCIATION OF INDEPENDENT MORTGAGE EXPERTS (“Defendant” or “AIME”), hereby files this Notice of Removal of Cause No. 048-362397-25, filed in the 48th District Court in and for Tarrant County, Texas to the United States District Court for the Northern District of Texas, Fort Worth Division, as provided by Title 28 U.S. Code, Chapter 89 and states:

1. Plaintiff Katherine Sweeney (“Plaintiff” or “Sweeney”) commenced the above-entitled action in the 48th District Court of Tarrant County, State of Texas (the “State Court”) and the action is now pending in that Court. Attached hereto are the following:

- a. Civil Cover Sheet
- b. Supplement Cover Sheet
- c. Index of documents filed in state court;
- d. Copy of state court docket;
- e. Plaintiff’s Original Petition;

- f. Citation
- g. Service Request Form;
- h. Affidavit of Service;
- i. Duplicate copy of Affidavit of Service; and
- j. Certificate of Interested Parties

2. AIME is the Defendant in the above-entitled action. AIME is a Michigan non-profit corporation with its principal place of business in Michigan. According to Plaintiff's Petition, Plaintiff is a resident of Texas.

3. According to the Petition, Plaintiff seeks monetary relief of over \$250,000.00.

4. A copy of Plaintiff's Citation and Original Petition were delivered to the Texas Secretary of State on March 11, 2025. Defendant does not concede that such delivery to the Texas Secretary of State constituted proper service of process upon Defendant, and Defendant reserves the right to contest the validity of such service.

5. The United States District Court for the Northern District of Texas, Fort Worth Division, has jurisdiction by reason of the diversity of citizenship of the parties.

6. No change of citizenship of parties has occurred since the commencement of the action.

7. Defendant will give written notice of the filing of this notice as required by 28 U.S.C. § 1446(d).

8. A copy of this notice will be filed with the clerk of the 48th District Court, Tarrant County, Texas, as required by 28 U.S.C. § 1446(d).

WHEREFORE, DEFENDANT NATIONAL ASSOCIATION OF INDEPENDENT MORTGAGE EXPERTS requests that this action proceed in this Court as an action properly removed to it.

Dated: April 10, 2025

Respectfully submitted,

SUSSMAN & MOORE, L.L.P.
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By: /s/ Weldon L. Moore, III
Weldon L. Moore, III
Texas Bar No. 14380500
**ATTORNEY FOR ASSOCIATION OF INDEPENDENT
MORTGAGE EXPERTS**

CERTIFICATE OF SERVICE

I, Weldon L. Moore, III, do hereby certify that a copy of the foregoing *Notice* was served on counsel for Plaintiff, William Cook and M. Jason Ankele, wcook@sullivancook.com and jankele@sullivancook.com via email this 10th day of April, 2025.

/s/ Weldon L. Moore, III
Weldon L. Moore, III